MEMO ENDORSED

MEMO ENDORSED

LAW OFFICES

DAVID WIKSTROM

WOOLWORTH BUILDING - 233 BROADWAY - SUITE 2208
NEW YORK, NY 10279

E-MAIL: DAVID@DAVIDWIKSTROM.COM

TELEPHONE: (212: 248-551)
FACSIMILE: (212: 248-2866)

October 23, 2012

The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 By Fax: (212) 805-7927 and Regular Mail

> Re: <u>United States v. Tai Nguyen</u> 12 CR 495 (NRB)

OCT 232012

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/23/2012

Dear Judge Buchwald:

MEMO ENDORSED

I write, with the consent of Assistant United States Attorney David Miller, for a modification of the bail limits set in the above case to permit the Defendant to travel to California between October 26 and November 4, 2012. As the Court knows, on Mr. Nguyen's release on bail, his travel was restricted to the Southern and Eastern Districts of New York, the District of New Jersey, and the District of Oregon. He is, and has been, in full compliance with the terms and conditions of his pretrial release.

Mr. Nguyen and his wife operate a business called "Bounce U," a play space for children, located in Pleasanton, California. They have lost the lease for those premises, and need to travel to California to shut down the business and arrange for storage of the fixtures and furniture. If granted permission, Mr. Nguyen would leave Oregon on October 26th, returning November 4th. While there, he would stay at his brother's house, located at 1268 W. Lagoon Rd., Pleasanton, CA 94566. Mr. Nguyen would provide advance information as to his travel itinerary to Pretrial Services. As indicated above, Assistant United States Attorney David Miller consents to this application.

I therefore respectfully request that the application be granted.

Sincerely,

Plania Wiketrom

cc: David Miller, AUSA